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4 SAUL EWING LLP

1888 Century Park East, Suite 1500

5 Los Angeles, California 90067

Telephone: (310) 255-6100

6 Facsimile: (310) 255-6200

7 Attorneys for Alan Gomperts, Daniel Halevy,
Susan Halevy, Debtors and Debtors in Possession

9 **UNITED STATES BANKRUPTCY COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

12 In re:

13 SEATON INVESTMENTS, LLC, *et al.*,

14 Debtors and Debtors In
15 Possession.

16 ☐ Affects All Debtors.

17 ☐ Affects Seaton Investments, LLC

18 ☐ Affects Colyton Investments, LLC

19 ☐ Affects Broadway Avenue Investments, LLC

20 ☐ Affects SLA Investments, LLC

21 ☐ Affects Negev Investments, LLC

22 ☒ Affects Alan Gomperts

23 ☒ Affects Daniel Halevy

24 ☒ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;

2:24-bk-12082-VZ; 2:24-bk-12091-VZ;

2:24-bk-12074-VZ; 2:24-bk-12075-VZ and

2:24-bk-12076-VZ

Chapter 11

**NOTICE OF APPLICATION AND
APPLICATION OF INDIVIDUAL
DEBTORS AND DEBTORS-IN-
POSSESSION TO AMEND
PREVIOUSLY APPROVED
EMPLOYMENT APPLICATION OF
SAUL EWING LLP AS GENERAL
BANKRUPTCY COUNSEL;
STATEMENT OF
DISINTERESTEDNESS**

[No Hearing Required]

27 **TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE AND**

28 **INTERESTED PARTIES:**

53281873.2
390855-00001

1 **PLEASE TAKE NOTICE** that the individual debtors and debtors in possession herein, Alan
2 Gomperts, Daniel Halevy and Susan Halevy (the “**Individual Debtors**”), will and hereby do move
3 the Court for an order amending the previously approved employment application of Saul Ewing
4 LLP (“**Saul Ewing**” or the “**Firm**”) as their general bankruptcy counsel pursuant to 11 U.S.C.
5 §327(a) (the “**Application**”), effective as of October 14, 2024.

6 On April 5, 2024, the Individual Debtors applied to employ the Firm as their general
7 bankruptcy counsel (the “Employment Application”)(doc. no. 23). The Employment Application
8 was approved by the Court’s order entered on April 30, 2024 (doc no. 51) effective March 18, 2024
9 (the “Employment Order”). A true and correct copy of the Employment Order is attached hereto as
10 Exhibit “1”.

11 On October 14, 2024, Archway Broadway Loan SPE, LLC (“Archway”) filed a “Complaint
12 on Probate Creditor’s Claim, Deemed Rejected, for,” among other things, Declaratory Relief,
13 Liability of Trustee of Decedent’s Revocable Trust, Fraudulent Transfer, Conversion and Breach of
14 Fiduciary Duty against Susan Halevy, aka Sue Halevy, individually and in her capacity as Trustee of
15 the Halevy Family Trust Dated September 8, 2010; 341 South Cannon LLC, a California limited
16 liability company; Daniel Halevy, in his capacity as Personal Representative of the estate of non-
17 debtor David Halevy, Deceased, and not in his individual capacity, commencing Adversary Case No.
18 2:24-ap-01241 (the “Archway Complaint” and “Archway Adversary Proceeding”).

19 The Archway Adversary Proceeding is related to claims filed which are now pending in a
20 probate proceeding in the Los Angeles County Superior Court, in a matter entitled *Estate of David*
21 *Halevy, Decedent*, assigned case number 24STPB01963 (“Decedent’s Estate Proceeding”).

22 By this Application, the Individual Debtors seek amendment of the Employment Application
23 to expand the Firm’s scope of work to advise and represent them in connection with any probate
24 related litigation in the Decedent’s Estate Proceeding as well as representing them in the Archway
25 Adversary Proceeding. By separate application, Debtors Sue and Daniel Halevy will also be seeking
26 the employment of special probate administration (not litigation) counsel to separately to assist them
27 in the administration of the Decedent’s Estate Proceeding and to otherwise assist with Sue with trust
28 and estates transactional and tax matters.

1 As noted above, 341 South Cannon LLC is also a defendant in the Archway Adversary
2 Proceeding. By this Application, the Individual Debtors seek amendment of the Employment
3 Application to expand the Firm's scope of work to also represent 341 South Cannon LLC to avoid a
4 default, since it is 100% owned by Sue Halevy.

5 The remaining provisions of the Firm's original employment in this matter, as approved by
6 the Employment Order, will remain in full force and effect and not be amended in any way by the
7 Application.

8 The Individual Debtors submit the Application pursuant to Federal Rules of Bankruptcy
9 Procedure 2014 and Local Bankruptcy Rules 2014-1(b) and 9013-1.

10 The Application is based upon this (a) Notice of Application, (b) the attached Application,
11 and the Statement of Disinterestedness, (c) the original Employment Application and Employment
12 Order (d) the complete files and records of this case, and (e) such other evidentiary matters as may
13 be presented to the Court.

14 **NOTICE IS GIVEN** that pursuant to Local Bankruptcy Rules 9013-1(f), 9013-1(o), each
15 interested party opposing, joining, or responding to the Application must, no later than 14 days from
16 the date of service of this Notice plus an additional 3 days if this notice of motion was served by mail
17 or pursuant to Fed. R. Civ. P. 5(b)(2)(D) or (F), file with the Clerk of the Bankruptcy Court and serve
18 upon counsel for the Individual Debtors, Zev Shechtman, Saul Ewing LLP, 1888 Century Park East,
19 Suite 1500 Los Angeles, California 90067, Zev.Shechtman@saul.com, and the United States
20 Trustee, 915 Wilshire Blvd., Suite 1850, Los Angeles, California 90017, either: (i) a complete written
21 statement of all reasons in opposition thereto or in support or joinder thereof, declarations and copies
22 of all photographs and documentary evidence on which the responding party intends to rely, and any
23 responding memorandum of points and authorities and a request for a hearing on the Application; or
24 (ii) a written statement that the application will not be opposed.

Pursuant to Local Bankruptcy Rule 9013-1(o)(3), failure to timely file and serve papers may be deemed by the Court to be consent to the granting or denial of the Application, as the case may be.

DATED: November 5, 2024

SAUL EWING, LLP

By:



ZEV SHECHTMAN

Attorneys for Alan Gomperts, Daniel Halevy and
Susan Halevy, Debtors and Debtors-in-Possession

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Debtors and debtors-in-possession Alan Gomperts, Daniel Halevy and Susan Halevy (the
3 “**Individual Debtors**”) hereby seek entry of an order pursuant to section 327(a) of title 11 of the
4 United States Code (the “**Bankruptcy Code**”), Rule 2014 of the Federal Rules of Bankruptcy
5 Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 of the Local Bankruptcy Rules for the
6 Central District of California (the “**Local Rules**”) amending the previously approved employment
7 application of Saul Ewing LLP (“**Saul Ewing**”), effective as of October 14, 2024.

8
9 **A. BANKRUPTCY BACKGROUND**

10 On March 18 and 19, 2024 (the “**Petition Date**”), the Individual Debtors and the above-
11 captioned non-individual debtors filed voluntary petitions for relief under Chapter 11 of the
12 Bankruptcy Code. The debtors remain in possession of their properties and continue to operate their
13 businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Code. The above-
14 captioned cases are jointly administered.

15
16 **B. THE INDIVIDUAL DEBTORS’ ORIGINAL RETENTION OF SAUL EWING AS**
17 **GENERAL BANKRUPTCY COUNSEL**

18 On April 5, 2024, the Individual Debtors sought to employ the Firm as their general
19 bankruptcy counsel (the “Employment Application”)(doc. no. 23). The Employment Application
20 was approved by the Court’s order entered on April 30, 2024 (doc no. 51) effective March 18, 2024
21 (the “Employment Order”). A true and correct copy of the Employment Order is attached hereto as
22 Exhibit “1”.

23
24 **C. RELIEF REQUESTED**

25 On October 14, 2024, Archway filed its Complaint commencing the Archway Adversary
26 Proceeding. The Archway Adversary Proceeding is related to claims filed which are now pending
27 in a probate proceeding in the Los Angeles County Superior Court, in a matter entitled *Estate of*
28

1 *David Halevy, Decedent*, assigned case number 24STPB01963 (the “Decedent’s Estate
2 Proceeding”).

3 By this Application, the Individual Debtors seek amendment of the Employment Application
4 to expand the Firm’s scope of work to advise and represent them in connection with any probate
5 related litigation in the Decedent’s Estate Proceeding as well as representing them the Archway
6 Adversary Proceeding. Debtors Sue and Daniel Halevy will also be seeking the employment of
7 special probate counsel separately to assist them in the administration of the Decedent’s Estate
8 Proceeding. Sue and Daniel Halevy lack funds with which to represent themselves in their non-
9 individual capacities they alleged to hold in the Archway Complaint. These claims, despite how they
10 are fashioned, require Sue and Daniel, the individuals who are the Debtors, to mount a defense.

11 As noted above, 341 South Cannon LLC is also a defendant in the Archway Adversary
12 Proceeding. By this Application, the Individual Debtors seek amendment of the Employment
13 Application to expand the Firm’s scope of work to also represent 341 South Cannon LLC to avoid a
14 default, since it is 100% owned by Sue Halevy. This entity lacks independent funds to defend itself
15 and judgment against this entity would result in a loss to Sue’s estate.

16 The remaining provisions of the Firm’s original employment in this matter, as approved by
17 the Employment Order, will remain in full force and effect and not be amended in any way by the
18 Application.

19 Further, the Individual Debtors believe that many or most of the claims alleged in the
20 Archway Adversary Proceeding are related to probate. Saul Ewing has probate litigation capacities
21 which are necessary for the defense of the Archway Adversary Proceeding. It is expected that probate
22 litigators from Saul Ewing will be involved, potentially both before this Court and in Probate Court.
23 The lead Saul Ewing probate litigator is Matthew Baker, whose 2024 rate is \$640/hour (subject to
24 annual increase) and his resume is attached hereto as Exhibit “2.” There may be other litigators,
25 whether probate, bankruptcy, or other practices, whose services may be required given the
26 complexity of the Archway Complaint.

D. THE FIRM'S ELIGIBILITY FOR EMPLOYMENT

The original Employment Application included an attached Statement of Disinterestedness for Employment for Professional Person Under Federal Rule of Bankruptcy Procedure 2014 (the "Statement"). This Application includes an attached updated Statement based upon the Application and to disclose that by virtue of its retention in this case pursuant to the original Employment Order, the Firm has an administrative expense claim in this case. To the best of Applicant's knowledge and after consideration of the disclosures in the attached Statement, Applicant believes the Firm continues to be eligible for employment.

WHEREFORE, the Individual Debtors request that the Court enter an order amending the previously approved employment application of Saul Ewing LLP as their general counsel, effective as of October 14, 2024, as described above and for such other and further relief as may be determined just and proper.

Dated: November 4, 2024

By: 

ALAN GOMPERTS
Debtor

Dated: _____

By: _____

DANIEL HALEVY
Debtor

Dated: _____

By: _____

SUSAN HALEVY
Debtor

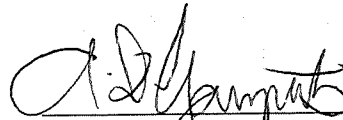
1 **D. THE FIRM'S ELIGIBILITY FOR EMPLOYMENT**

2 The original Employment Application included an attached Statement of Disinterestedness
3 for Employment for Professional Person Under Federal Rule of Bankruptcy Procedure 2014 (the
4 "Statement"). This Application includes an attached updated Statement based upon the Application
5 and to disclose that by virtue of its retention in this case pursuant to the original Employment Order,
6 the Firm has an administrative expense claim in this case. To the best of Applicant's knowledge and
7 after consideration of the disclosures in the attached Statement, Applicant believes the Firm continues
8 to be eligible for employment.

9
10 **WHEREFORE**, the Individual Debtors request that the Court enter an order amending the
11 previously approved employment application of Saul Ewing LLP as their general counsel, effective
12 as of October 14, 2024, as described above and for such other and further relief as may be
13 determined just and proper.

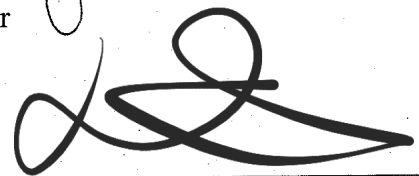
14
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17
18 Dated: October 4, 2024

By:


ALAN GOMPERTS
Debtor

19
20
21 Dated: 04 November 2024

By:


DANIEL HALEVY
Debtor

22
23
24 Dated: 04 November 2024

By:


SUSAN HALEVY
Debtor

**AMENDED STATEMENT OF DISINTERESTEDNESS FOR EMPLOYMENT
OF PROFESSIONAL PERSON UNDER F.R.B.P. 2014**

1. Name, address and telephone number of the professional (“the Professional” or “the “Firm”) submitting this Statement:

Saul Ewing LLP
1888 Century Park East, Suite 1500
Los Angeles, California 90067
Telephone: 310-255-6100
Facsimile: 310-255-6200

2. The services by the Professional in this case are (specify):

See Pages 6-7 of the original Employment Application,
and the Court’s Order entered on April 30, 2024 attached hereto as Exhibit 1.

See also Item C of the within Application

3. The terms and source of the proposed compensation and reimbursement of the Professional are (specify):

See Pages 2-3 of the original Employment Application
and the Court’s Order entered on April 30, 2024, which is attached hereto as Exhibit 1.

4. The nature and terms of retainer (i.e., nonrefundable versus an advance against fees) held by the Professional are (specify):

See Pages 2-3 of the original Employment Application
and the Court’s Order entered on April 30, 2024, which is attached hereto as Exhibit 1.

5. The investigation of disinterestedness made by the Professional prior to submitting this Statement consisted of (specify):

We conducted a conflict check with respect to all jointly-administered Debtors, their owners and principals, and all of the creditors listed on the master mailing list to determine whether the firm has any prior attorney-client relationship or other connection thereto.

6. The following is a complete description of all of the Professional’s connections with the debtor, principals of the debtor, insiders, the debtor's creditors, any other party or parties in interest, and their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee (specify, attaching extra pages as necessary):

None, except the Firm has been retained as general counsel to the
Individual Debtors in this case pursuant to the Court’s Order entered on April 30, 2024.

1 7. The Professional is not a creditor, an equity security holder or an insider of the debtor, except
2 as follows (specify, attaching extra pages as necessary):

3 The Firm has been retained as general counsel to the Individual Debtors in this case pursuant
4 to the Court's Order entered on April 30, 2024. The Firm has an administrative expense claim
for fees and expenses of \$146,725.63 as of October 31, 2024, excluding any payments
received.

5 The Firm has received compensation via professional fee statement procedures of
6 \$131,889.13 as of October 31, 2024.

7 8. The Professional is not and was not, within 2 years before the date of the filing of the petition,
a director, officer or employee of the debtor.

8 9. The Professional does not have an interest materially adverse to the interest of the estate or
9 of any class of creditors or equity security holders, by reason of any direct or indirect
relationship to, connection with, or interest in, the debtor, or for any other reason, except as
follows (specify, attaching extra pages as necessary):

10 See also response to paragraph 6 above.

11 10. Name, address and telephone number of the person signing this Statement on behalf of the
12 Professional and the relationship of such person to the Professional (specify):

13 Zev Shechtman
14 Saul Ewing LLP
1888 Century Park East, Suite 1500
15 Los Angeles, California 90067
Telephone: 310-255-6100
16 Facsimile: 310-255-6200
Zev.Shechtman@saull.com

17 11. The Professional is not a relative or employee of the United States Trustee or a Bankruptcy
18 Judge, except as follows (specify, attaching extra pages as necessary):

19 None.

20 12. Total number of attached pages of supporting documentation: 7

21
22 13. After conducting or supervising the investigation described in paragraph 5 above, I declare
23 under penalty of perjury under the laws of the United States of America, that the foregoing is
true and correct except that I declare that paragraphs 6 through 9 and 11 are stated on
24 information and belief.

25 Executed on November 5, 2024, at Los Angeles, California.

26 
27 _____
Zev Shechtman

EXHIBIT 1

1 ZEV SHECHTMAN (BAR NO. 266280)
Zev.Shechtman@saul.com
2 CAROL CHOW (BAR NO. 169299)
carol.chow@saul.com
3 TURNER N. FALK (Admitted pro hac vice)
turner.falk@saul.com
4 SAUL EWING LLP
1888 Century Park East, Suite 1500
5 Los Angeles, California 90067
Telephone: (310) 255-6100
6 Facsimile: (310) 255-6200

FILED & ENTERED

APR 30 2024

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY carranza DEPUTY CLERK

7 *Proposed Attorneys for Alan Gomperts, Daniel*
Halevy and Susan Halevy
8 *Debtors and Debtors in Possession*

9
10 **UNITED STATES BANKRUPTCY COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

12 In re:

13 SEATON INVESTMENTS, LLC, *et al.*,

14 Debtors and Debtors In
15 Possession.

- 16 ☐ Affects All Debtors.
17 ☐ Affects Seaton Investments, LLC
18 ☐ Affects Colyton Investments, LLC
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21 ☒ Affects Negev Investments, LLC
22 ☒ Affects Alan Gomperts
23 ☒ Affects Daniel Halevy
24 ☒ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**ORDER GRANTING APPLICATION
OF INDIVIDUAL DEBTORS AND
DEBTORS-IN-POSSESSION TO
EMPLOY SAUL EWING LLP AS
GENERAL BANKRUPTCY
COUNSEL**

[No Hearing Required]

25 On April 5, 2024, the individual debtors and debtors in possession herein, Alan Gomperts,
26 Daniel Halevy and Susan Halevy (the “**Individual Debtors**”), filed their *Application of Individual*
27 *Debtors and Debtors-In-Possession to Employ Saul Ewing LLP as General Bankruptcy Counsel*
28 (the “**Application**”) (docket no. 23), which was served using the procedure of LBR 9013-1(o).

1 The Court considered the Application, the Statement of Disinterestedness (docket no. 23),
2 and all papers filed in support thereof. No party filed an opposition or request for a hearing. Good
3 cause appearing, **IT IS ORDERED:**

4 1. The Application is granted in its entirety.

5 2. The Individual Debtors are authorized to retain Saul Ewing LLP as their general
6 bankruptcy counsel effective as of March 18, 2024.

7 3. Saul Ewing LLP is authorized to draw down on its retainer in accordance with the
8 United States Trustee's Guide to Application for Retainers, except that the retainer may be
9 maintained in the Firm's attorney-client trust account rather than a segregated trust account.

10 4. Saul Ewing LLP is authorized to submit a monthly Professional Fee Statement each
11 month until its retainer is exhausted.

12 #####

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24 Date: April 30, 2024

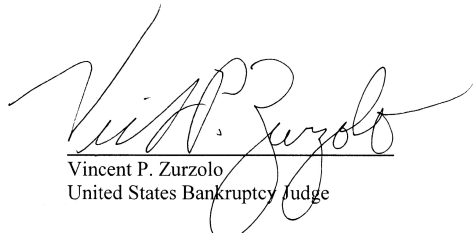

Vincent P. Zurzolo
United States Bankruptcy Judge

EXHIBIT 2

SAUL EWING

LLP

MATTHEW BAKER

Partner

matthew.baker@saul.com
(310) 255-6162



Primary Office
Los Angeles



Overview

Matthew Baker handles trust and estate litigation, with a focus on advocating for the rights of beneficiaries and fiduciaries' conduct in trust and estate matters. Whether it is contesting the validity of a trust or will or representing a fiduciary in a breach of trust claim, Matthew is equipped to handle a wide range of legal issues.

Services

[Trusts & Estates](#)

[Trust & Estate Dispute](#)

[Resolution](#)

[Litigation](#)



Matthew was named to the Los Angeles Super Lawyers list for Estate & Trust Litigation in 2024.

Experience

Estate & Trust Litigation

- Litigated and ultimately settled multi-state litigation, with multiple appeals, resulting in a published decision on constitutional jurisdiction in trust disputes involving a trustee and trust beneficiaries outside of California.

- Recovered stolen trust property and obtained an award of double damages, attorney fees and costs in the removal of a co-trustee who victimized her mother leaving her abandoned and unable to pay her bill.
- Defended a trust accounting dispute between siblings where two of three daughters alleged that the successor trustee daughter had misappropriated trust assets to their detriment, thereby avoiding client's suspension, removal, and surcharge.
- Prosecuted breach of fiduciary duty, breach of trust, and fraudulent concealment against the trustee on behalf of siblings who were beneficiaries of an education trust, resulting in a full recovery of attorney fees.
- Defeated an eight-figure fiduciary fraud claim brought by a conservator, resulting in dismissal of all claims.



Matthew has been selected as a
Rising Star in Estate & Trust Litigation
by Los Angeles Super Lawyers
annually since 2018.

Credentials & Accolades

Degrees

- J.D., *cum laude*, Fordham University School of Law
- B.A., New York University

Honors & Awards

- Named to the Los Angeles Super Lawyers list for Estate & Trust Litigation, 2024
- Named to *The Best Lawyers in America: Ones to Watch* list, Trusts and Estates Litigation and Trusts and Estates, 2024 to present
- Selected to the Top 100 Up-and-Coming Rising Stars list by Los Angeles, California Super Lawyers, 2023
- Recognized in the L.A. Times B2B Publishing Business of Law Magazine as a Visionary, 2023
- Recognized as a "Top Litigator" in the Leaders of Influence: Litigators & Trial Lawyers list, Los Angeles Business Journal
- Selected as an Associate Fellow by the Litigation Counsel of America

- Selected a Rising Star in Estate & Trust Litigation by Los Angeles Super Lawyers, 2018 to 2023
- Received the Public Counsel Pro Bono Award for the Foster Youth Project, 2016

Bar Admissions

- California

Outside the Firm

Professional Involvement

- Past President, Santa Monica Bar Association
- President, Beverly Hills Estate Planning Council
- Delegate, Los Angeles County Bar Association, 2020–2021
- Member, Beverly Hills Bar Association – Trusts and Estates Section
- Member, Los Angeles County Bar Association – Trusts and Estates Executive Committee
- Member, ProVisors
- Member, Professional Fiduciary Association of California
- Volunteer District Attorney, Los Angeles County District Attorney's Office, 2022
- Volunteer, Litigation Subcommittee for the Trusts and Estates Executive Committee, California Lawyers' Association, 2023–2024
- Volunteer Attorney, Public Counsel Law Center
 - Children's Rights Project
 - Public Counsel's Debtor Assistance Project
 - Center for Veterans' Advancement

Community Connections

- Member, Fordham University School of Law Alumni Association of Los Angeles

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **Notice of Application and Application of Individual Debtors and Debtors-In-Possession to Amend Previously Approved Employment Application of Saul Ewing LLP as General Bankruptcy Counsel; Statement of Disinterestedness** be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **November 5, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) **November 5, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor:

Alan Gomperts
264 South Oakhurst Drive
Beverly Hills, CA 90212

Debtor:

Susan Halevy
257 South Linden Drive
Beverly Hills, CA 90212

Debtor:

Daniel Halevy
8561 Horner Street
Los Angeles, CA 90035

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 5, 2024

Date

Hannah Richmond

Printed Name

/s/ Hannah Richmond

Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- **Tanya Behnam** tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- **Jacquelyn H Choi** jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- **Carol Chow** Carol.Chow@saul.com, hannah.richmond@saul.com, easter.santamaria@saul.com
- **Robert F Conte** robert.conte@usdoj.gov, caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- **Ryan Coy** ryan.coy@saul.com, hannah.richmond@saul.com
- **Christopher Cramer** secured@becket-lee.com
- **Turner Falk** turner.falk@saul.com, tnfalk@recap.email
- **Michael G Fletcher** mfletcher@frandzel.com, sking@frandzel.com
- **Todd S. Garan** ch11ecf@aldridgepите.com, TSG@ecf.inforuptcy.com; tgaran@aldridgepите.com
- **Richard Girgado** rgirgado@counsel.lacounty.gov
- **Jacqueline L James** jjames@hrhlaw.com
- **Kelly L Morrison** kelly.l.morrison@usdoj.gov
- **Avi Edward Muhtar** amuhtar@crowinandstonelaw.com
- **Bruce D Poltrock** bpoltrock@frandzel.com, achase@frandzel.com
- **Paige Selina Poupart** ppoupart@frandzel.com, achase@frandzel.com
- **Zev Shechtman** Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com; hannah.richmond@saul.com
- **Derrick Talerico** dtalerico@wztslaw.com, maraki@wztslaw.com, sfritz@wztslaw.com, admin@wztslaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

2. SERVED BY UNITED STATES MAIL (continued):

Los Angeles County Treasurer/Tax Collector Attn Bankruptcy Unit PO Box 54110 Los Angeles Ca 90054-0110	US Small Business Administration 14925 Kingsport Rd Fort Worth, TX 76155-2243	US Small Business Administration 409 3rd St SW Washington, DC 20416-0005
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Alta Fire Pro PO Box 7007 Mission Hills, CA 91346-7007	Balboa Capital Corporation 575 Anton Blvd 12th Floor Costa Mesa Ca 92626-7685	California Refrigeration & Supply 1926 Glendon Ave Apt 4 Los Angeles, CA 90025-4661
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